

#### PART IV - EXPLOSIVE ORDNANCE DISPOSAL UNIT (EODU)

##### IV.A. SUMMARY

The Permittee operates a Facility that specializes in the testing of nuclear weapons. Nonnuclear weapon tests have been or may be performed on the Nevada Test Site. The Permittee proposes to operate an Explosive Ordnance Disposal Unit (EODU) within Area 11 of the U.S. Department of Energy's (DOE) Nevada Test Site (NTS). The EODU is an explosive detonation unit for the treatment of explosive wastes, which are hazardous wastes as defined under 40 CFR §§ 261.21, 261.23, 261.24, and 261.33. Neither nuclear containing nor nuclear contaminated materials are accepted or detonated at the EODU. The EODU consists of a detonation pit surrounded by an earthen pad approximately 8 m (25 ft) by 31 m (100 ft) and ancillary equipment which includes a bunker, electric shot box, and electric wire. The Permittee is allowed to detonate a maximum of 45.4 kilograms (100 pounds [lbs]) of approved waste at a time, not to exceed one detonation event per hour.

##### IV.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

IV.B.1 The Permittee may open detonate the following waste explosives subject to the terms of this permit as described below.

Type of unit: Open detonation area

Description of unit: Graded area approximately 8 m (25 ft) by 31 m (100 ft) and is free of any magazines or other materials. The detonation area is located on top of a small hill. Ancillary equipment includes a bunker, electric shot box, and electric wire.

No.	Description of Hazardous Waste	EPA Hazardous Waste No.
1	Commercially manufactured explosives (capable of detonation as described in 40 C.F.R. 265.382)	D003
2	Small arms ammunition	D003
3	Blasting caps	D003
4	Black Powder	D001, D003
5	Smoke Pots (Hexachloroethane)	D003, D034

Allowed Quantity: 45.4 kg (100 lbs) per event; 1 (one) event per hour

IV.B.2 Treatment Prohibitions

IV.B.2.a The Permittee is prohibited from treating hazardous waste that is not identified in permit condition IV.B.1

IV.B.2.b The Permittee is prohibited from treating hazardous waste that is generated outside of DOE/NV or DoD (Department of Defense) NTS activities. The DOE/NV shall keep the NDEP apprised of new DOE/NV or DoD NTS activities generating wastes requiring treatment at the EODU, once the wastes have been generated.

IV.B.2.c The Permittee may submit a written request to treat explosives not identified above (eg., a Forbidden explosive, as defined in 49 CFR §173.54). The Permittee is prohibited from treating the special case hazardous waste until written approval by the NDEP is received by the DOE/NV.

IV.C. DESIGN, CONSTRUCTION, AND OPERATING REQUIREMENTS

IV.C.1. Open Detonation On An Earthen Pad

IV.C.1.a. The Permittee shall operate and maintain the open detonation area in accordance with the operating procedures contained in § P.3.d.2 of the permit application.

IV.C.1.b. The Permittee shall operate and maintain the open detonation area in order to minimize air emissions or exposure of personnel site to toxic or hazardous emissions in accordance with § P.3.d.2.a of the permit application.

IV.C.1.c. Any residues (i.e., shrapnel, wire, casings) from the treatment of waste explosives visible on or around the detonation pad shall be removed at the next site visit or inspection of the EODU.

#### IV.D. HANDLING AND STORAGE REQUIREMENTS

IV.D.1. The Permittee shall handle/manage explosive waste in accordance with § P.3.d.2.b of the permit application.

IV.D.2. The Permittee shall store explosive wastes in accordance with § P.3.d.3 and P.3.d.4 of the permit application.

#### IV.E. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall inspect the Explosive Ordnance Disposal Unit in accordance with the EODU Inspection Schedule as described in P.3.f.3 and Table P.3.f-1 of the permit application.

#### IV.F. PREVENTION OF UNINTENDED IGNITION OR REACTION OF WASTES

The Permittee shall follow the procedures, contained in §§ P.3.d and P.3.f of the permit application to prevent unintended ignition or reaction of wastes.

#### IV.G. MONITORING REQUIREMENTS

IV.G.1 The Explosive Ordnance Disposal Unit Site Characterization Reports received by NDEP on February 8, 1995 and February 26, 2000 pursuant to the EODU **Site Characterization Plan** as specified in § P.3.d.7.b of the permit application are hereby incorporated by reference as the existing site characterization data for the EODU.

IV.G.2 The Permittee shall repeat the EODU site characterization effort pursuant to the EODU **Site Characterization Plan** as specified in § P.3.d.7.b of the permit application during the final year of the effective life of this permit and submit a final report to NDEP.

IV.G.3. NDEP will make a determination regarding the applicability of residue management and/or subsurface monitoring based on the results of the Area 11 EODU site characterization. If, at any time, in the opinion of NDEP, residue management and/or subsurface monitoring is required, NDEP will modify the permit to include additional management practices.

IV.H. CLOSURE

- IV.H.1. At final closure of the EODU the Permittee shall follow the procedures in the **Closure Plan** as described in § P.3.i of the permit application.
- IV.H.2. If after closure the Permittee finds that not all contaminated soils and debris can be removed or decontaminated in accordance with the **Closure Plan**, then the Permittee shall close the EODU and develop and implement a post-closure plan in accordance with the post closure care requirements of 40 CFR § 264.603.

IV.I. RECORDKEEPING

- IV.I.1 The Permittee shall develop and maintain all records required to comply with 40 CFR §§ 264.73 and 264.602, and §§ P.3.d.7.b, P.3.d.7.d and P.3.h of the permit application.
- IV.I.2 The Permittee shall maintain a log of all wastes treated at the EODU in the Facility Operating Record. The log shall include a description of each waste treated which meets the 40 CFR § 265.382 definition of waste explosive, with a reference to documentation demonstrating the waste meets the definition of a Class 1 Explosive, under 49 CFR Subpart C.